

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105

September 3, 1998

Hemant S. Patel, LBNL Program Manager
U.S. Department of Energy
Environmental Restoration Division
1301 Clay Street
Oakland, CA 94612-5208

Re: Lawrence Berkeley National Laboratory
EPA ID Number: CA4890008986

Dear Mr. Patel:

We have already provided you with our re-evaluation report for the Lawrence Berkeley National Laboratory (LBNL). The re-evaluation was based on preliminary assessment/site inspection information submitted by the Committee to Minimize Toxic Waste and your agency to EPA. The purpose of the re-evaluation is twofold: (1) to determine if the facility meets CERCLA requirements as defined in Section 120; and (2) to determine if site conditions at the facility pose a significant threat to human health and the environment such that they warrant placement of the site on the National Priorities List (NPL).

If you have any comments on the re-evaluation report, we would appreciate receiving them within two weeks of your receipt of this letter so that we may issue the report. Based on our evaluation of the information submitted, further action appears to be warranted, and we request that you submit additional information (see Enclosure 1) in order for EPA to complete the evaluation of the site.

As you know, the Tritium Issues Work Group is developing a Statement of Work for the purpose of obtaining a contractor to develop and implement an independent sampling plan. EPA will work with the Work Group to ensure that the Statement of Work includes collecting the data that EPA needs to complete the evaluation of the site. EPA will then evaluate the data and make the Superfund listing decision.

All information that you provide to EPA will be subject to public disclosure to the extent provided by the Freedom of Information Act, 5 U.S.C. Section 552, and EPA's Business Confidentiality Regulations, 40 CFR Part 2 (in particular, 40 CFR 2.202 et seq. and 2.305). To claim confidentiality, you must clearly identify the information to which the claim applies.

Information covered by a confidentiality claim will be disclosed by EPA only to the extent and by means of the procedures set forth in 40 CFR Part 2. If no claim of confidentiality

accompanies the information when it is submitted, EPA may make the information available to the public without further notice to you.

Should you have any questions pertaining to this matter, please contact Philip Armstrong of the States, Planning, and Assessment Office at (415)744-2349. Please send your written response to Philip Armstrong, U.S. Environmental Protection Agency, 75 Hawthorne Street, San Francisco, CA 94105.

Thanks for your cooperation.

Sincerely,
Betsy Curnow, Chief
States, Planning, and Assessment Office
Superfund Division

Enclosure

cc: Gene Bernardi, Committee to Minimize Toxic Waste, w/enclosure
Pamela Sihvola, Committee to Minimize Toxic Waste, w/enclosure
Janice Parenti, General Law Division, U.S. Department of Energy, w/enclosure -
Bernie Edrada, California Department of Toxic Substances Control, w/enclosure
Michael Rochette, California Regional Water Quality Control Board, w/enclosure
Ed Bailey, California Department of Health Services, w/enclosure
Steve Hsu, California Department of Health Services, w/enclosure
Sudana Kwok, California Department of Health Services, w/enclosure
Paul Lavelly, University of California, Berkeley, w/enclosure
Dick Nolan, U.S. Department of Energy, w/enclosure
Ken Rivera, U.S. Department of Energy, w/enclosure
Nabil Al-Hadithy, City of Berkeley, w/enclosure
Leroy Griffin, City of Oakland, w/enclosure
Pratap Chattejee, Community Environmental Advisory Commission, w/enclosure
John Selawsky, Community Environmental Advisory Commission, w/enclosure
Periann Wood, EPA, w/enclosure
Shelly Rosenb!urn, EPA, w/enclosure
Michael Bandrowski, EPA, w/enclosure

ENCLOSURE I
LAWRENCE BERKELEY NATIONAL LABORATORY
REQUEST FOR ADDITIONAL INFORMATION

1. Ambient Air Sampling Data for Tritium - Ambient air data should be collected at appropriate locations to determine whether each target distance category¹ is subject to air contamination. Ambient air samples should be analyzed using analytical methods that have been reviewed and approved by EPA. Comparable background samples from a location that is not influenced by site activities should be collected over the same time interval as the other ambient air samples using the same collection and analytical procedures as the other ambient air samples. We also recommend that some ambient air samples be collected at nearby residences to determine the ambient air quality at those locations.
2. Soil Sampling Data for Tritium - Surface soils within 0.5 mile of the National Tritium Labeling Facility stack should be sampled sufficiently to delineate any areas contaminated with tritium. Soil samples should be collected within 2 feet of the surface², but not from areas covered by impervious surfaces, e.g., buildings and paving. In areas not covered by impervious surfaces, a grid with 200-foot centers would provide enough sample coverage to identify areas of tritium contamination. Where buildings and other impervious surfaces impede sampling on a grid, samples should be collected within 200 feet of regularly occupied buildings. If samples from the outer edges of the sampling grid contain elevated tritium concentrations, additional samples should be collected. Soil samples should be analyzed for tritium using analytical methods that have been reviewed and approved by EPA. Comparable background samples from a location with similar soil types that is not influenced by site activities should be collected using the same collection and analytical procedures as the other soil samples.
3. Surface Water and Sediment Sampling Data for Tritium - Surface water and sediment samples should be collected from Strawberry Creek, including the storm drain outfall to San Francisco Bay (south of the intersection of University Avenue and West Frontage Road) and the portions of Strawberry Creek "daylighted" (where the underground storm drain has been replaced by an open surface water channel), e.g., Strawberry Creek Park in Berkeley. Surface water and sediment-samples should be analyzed for tritium using analytical methods that have been reviewed and approved by EPA. Comparable background samples should be collected over the same time interval both from a location in San Francisco Bay (at a similar depth) and from a similar creek beyond the influence of the site activities using the same collection and analytical procedures as the other surface water and sediment samples. Some surface water and sediment samples should be collected at any sensitive environments in the Strawberry Creek drainage basin that may be impacted by site activities.

¹ According to Section 7.5 of the HRS Guidance Manual (November 1992), target distance categories are concentric rings with radii 1/4, 1/2, 1, 2, 3, and 4 miles from the sources at the site. As described in Section 6.3 of the Hazard Ranking System (HRS; Appendix A to 40 CFR Part 300), the HRS model calculates the number of people who are affected by actual (Level I or Level II) or potential contamination from the site based on those target distance categories.

- 2 According to Section 4.7 of the Guidance for Performing Site Inspections Under CERCLA (September 1992), soil exposure samples must be collected within 2 feet of the surface.
4. A sample location map should be provided for the air, soil, surface water, and sediment samples collected. QA/QC documentation should also be produced and should accompany the analytical results. We also recommend that prior to sampling, a quality assurance project plan be developed and submitted for review and approval to EPA at the following address:

Dr. John Griggs
U.S. Environmental Protection Agency
National Air, Radiation, and Environmental Laboratory
540 South Morris Avenue
Montgomery, Alabama 36115-2601
5. Information on the surface water pathway downstream of the site should be obtained, e.g., surface water bodies, fisheries, and sensitive environments.